



Intercontinental Terminals Company (ITC) Fire Morning Update
Deer Park, Texas
March 29, 2019 0000 – March 29, 2019 1159

Incident Management Objectives:

Objective 1: Ensure the health and safety of the public and response personnel.

Objective 2: Establish an incident management structure and processes employing the Incident Command System to enable effective overall management of the event with deployment of resources (staff and equipment) in a rapid, focused and well-coordinated manner.

Objective 3: Encourage a collaborative federalism approach, where Federal, State, Tribal, and local governments interact cooperatively and collectively to solve common problems.

Objective 4: Take actions to assess the on-site and off-site impacts during the emergency response phase of this incident. Provide this information to state and local authorities to assist them in their decision to protect the local citizens.

Objective 5: Conduct activities to prevent off-site releases from the ITC Tank Farm.

Objective 6: Respond to, mitigate and recovery off-site releases from the ITC Tank Farm.

Objective 7: Maintain open communication with Regional management

Incident Overview:

On March 17, 2019, an above ground storage tank containing Naphtha, caught fire at the Intercontinental Terminal Company (ITC), LLC facility in Deer Park Texas. The ITC facility consists of 15 80,000-barrel capacity above ground storage tanks containing petroleum products including Naphtha, Xylene, Toluene, Gasoline Blendstock, and Base Oil. Eleven of the 15 80,000-barrel capacity above ground storage tanks on site were involved in the fire, resulting in the release of contaminants into the atmosphere, as well discharging the contents of the tanks to drainage pathways. Firefighting water and foam potentially containing petroleum products were released from an outfall due to accumulation of water from firefighting efforts. Various firefighting organizations assisted in putting out the fire utilizing a variety of firefighting foams.

A partial breach of the tank farm containment wall on the northeast side near Tank 80-7 occurred at approximately 12:00 pm on March 22, 2019, to the ditched area and into Tucker Bayou. Additional boom was placed along the ditch leading to Tucker Bayou and Buffalo Bayou (Houston Ship Channel). The Responsible Party's contractor has rebuilt the containment wall using clay material.

At approximately 3:40 pm on March 22, 2019, three tanks reignited. The fire spread from the containment area through the breached containment wall into the ditch along Tidal Road. Foam was applied to the tanks and the ditch to extinguish the fire.

During and after the fire and the breach of the secondary containment, several readings of benzene above 1.0 ppm were detected (highest was 16.5 near National Tank Services) by the various entities conducting air monitoring through the afternoon and night. These readings were located along the ship channel.

The United States Coast Guard (USCG) Captain of the Port is continuing the controlled open for the Ship Channel on March 26, 2019, with traffic during the daytime only. Decontamination vessels are being positioned to help ships that may have residue on the hulls.

Due to the initial fires and subsequent releases, shelters in place have occurred throughout the week of March 17, 2019.

Executive Overview:

- As of 7:00 pm on March 29, the Harris County EOC transitioned back to normal operations.
- At 11:20 pm on March 29, 2019, ITC sent out an e-notify to surrounding industry and local officials after a significant benzene detection at the Vo-Pak facility north of the tank farm recommending shelter-in-place. At 1:25 am, Vo-Pak reported sheltering-in-place.
- At approximately 3:25 am on March 30, 2019, ITC staging area was evacuated due to elevated benzene levels (0.925 parts per million (ppm)). Further monitoring showed non-detection.
- EPA continues to ensure the health and safety of the public and response personnel. At approximately 5:00 am on March 30, 2019, benzene readings above 0.5 ppm were recorded near Independence Parkway going towards Battleship Memorial Park. Workers and responders were required to wear a respirator due to elevated benzene readings. The Battleship Memorial Park continues to be closed to public. Both the tank farm and the Bayou are considered to be the sources of the benzene elevated readings.
- On March 29, 2019, EPA requested the Planning Group/ITC to produce a map correlating the benzene elevated readings north of the channel with known pockets of product in the channel or bayou for potential prioritization of resources.
- On March 29, 2019, a Wildlife Management Plan was developed and signed off by ITC, United States Fish and Wildlife Service (USFWS), Texas Parks and Wildlife Department (TPWD), and Wildlife Response Services. Several dead turtles were found early on March 30, 2019, in an impacted area.
- On March 29, 2019, ITC has requested modification to the Statement of work in the Order issued under the Clean Water Act by EPA on March 23. OSC Adams and EPA Attorney Quinones are responding to the request.
- ITC continues foaming of the secondary containment to prevent reignition and reduce emissions as necessary.
- EPA conducted surface water sampling on March 29, 2019 at ten sample locations. Samples were collected from upstream the confluence of Buffalo Bayou and the San Jacinto River (in the Old River at River Terrace Park and at the shoreline of Juan Sequin Historic Park), in the main channel of the San Jacinto River (upstream of the confluence with Buffalo Bayou), and downstream in the San Jacinto River. The surface water samples will be analyzed for Per- and polyfluoroalkyl substances, Volatile Organic Compounds (VOCs), Semi-volatile Organic Compounds (SVOCs), Chemical Oxygen Demand (COD), and Oil & Grease.
- Several entities including Texas Commission on Environmental Quality (TCEQ), EPA, and ITC continue to conduct air monitoring around the tank farm, in adjoining industrial areas, and communities downwind from the facility.
- The Airborne Spectral Photometric Environmental Collection Technology (ASPECT) aircraft did not fly during this reporting period.
- EPA conducted air sampling using the Trace Atmospheric Gas Analyzer (TAGA) on March 29, 2019. The TAGA analyzed the air samples for benzene, toluene and xylene. The TAGA air sampling results were compared to the Texas Commission on Environmental Quality (TCEQ) short-term Air Monitoring Comparison Values (AMCVs) and found no exceedances of the short-term AMCVs for toluene and xylene. The TAGA air sampling results found exceedances of the short-term AMCV for benzene (0.18 ppm). These exceedances of the short-term AMCV for benzene were north west of the ITC site and have been shared with unified command and local officials.
- The Strike Team comprised of EPA and ITC were sent to the areas around Channelview (north of the site) due to elevated readings of benzene during the night. Unified Command and Harris County were kept apprised of the readings.

- EPA conducted handheld air monitoring from March 29, 2019 (12:00 am) to March 29, 2019 (11:59 pm) at 45 locations in areas located northwest of the Site as well as Buffalo Bayou. Results were reported above the detection limit at 12 locations for total volatile organic compounds (VOCs), one location for carbon monoxide (CO), and 12 locations for benzene. Benzene was detected at ten of these locations above the short-term AMCVs for benzene (0.18 ppm). EPA will conduct additional air monitoring and deploy the Trace Atmospheric Gas Analyzer (TAGA) to determine if the short-term AMCV for benzene continues to be exceeded.
- ITC continued air monitoring from 12:00 am on March 29, 2019 to 11:59 pm on March 29, 2019. There were 3,114 VOC readings (693 detections) and 2,460 benzene readings (670 detections).
- TCEQ continued handheld air monitoring on March 29; from 12:00 am to 10:00 approximately 164 readings were taken. No readings above the Unified Command action level were detected.
- Unified Command developed, reviewed, and approved the Incident Action Plan (#8) for the next operational period (which is 48 hours as of this IAP).
- Vacuum truck operations at Tucker Bayou and the outfall ditch continue on a 24-hour basis.
- On March 29, 2019, ITC continues to empty the impacted tanks into non-impacted tanks, secondary containment, or the wastewater treatment tank. The following table provides the status of the tanks.

Tank Status	Tank No.
Complete	80-2, 80-3, 80-14, 80-15
In Process	80-11
Scheduled to be emptied on March 30, 2019	80-5, 80-6, 80-9, 80-12

Coordination with State Agencies:

On March 17, 2019, in response to a tank fire at the ITC, federal, state and local agencies joined ITC in a Unified Command. Multiple agencies including the United States Coast Guard, the TCEQ, and Harris County Pollution Control Services supported the response effort.

EPA Resources:

Personnel	EPA R6 Dallas	ITC Deer Park	Total
EPA Region 6	9	7	16
EPA Non-Region 6	0	4	4
START	1	14	15
Other Contractors	0	8	8
Total	10	33	43

Additional Information: Air Monitoring and Water Sampling locations:

